

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ELECTRONIC FRONTIER FOUNDATION,

Plaintiff,

VS.

DEPARTMENT OF JUSTICE,

Defendant.

Case No. 10-CV-4892-RS

• ORDER

**STIPULATED REQUEST FOR ORDER
TO CONTINUE DEADLINE TO FILE
A PROPOSED JUDGMENT
TERMINATING THIS ACTION**

[CIV. L.R. 6-2]

The Court has ordered the parties to submit a proposed judgment to terminate this action by December 2, 2013. Order Re Renewed Cross-Motions for Summary Judgment (ECF No. 75) at 10. For the reasons discussed below, the parties have stipulated to and request a one-week extension of this deadline until December 9, 2013.

In response to the Court’s Summary Judgment Order, the Criminal Division, Federal Bureau of Investigation, and Drug Enforcement Administration (collectively, “DOJ Components”)

1 processed and mailed out certain additional documents to Plaintiff on November 21, 2013. *Id.* The
2 materials were inadvertently sent to Plaintiff's prior address. As a result, counsel for Plaintiff has
3 not yet received the materials, and due to work-related travel, likely will not be able to review the
4 materials before the Thanksgiving holiday weekend. In addition, Government counsel has
5 preexisting international travel plans from November 28, 2013 through December 4, 2013.
6 Therefore, a one-week extension is needed to allow Plaintiff adequate time to review the DOJ
7 Components' productions and for the parties to meet and confer regarding a proposed judgment
8 terminating this action.
9

10 The requested changed will not affect any other dates in the present schedule.
11

12 DATED: November 26, 2013

13 /s/ Nicholas Cartier
14 NICHOLAS CARTIER, CA Bar #235858
15 Trial Attorney, Federal Programs Branch
16 Civil Division
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18 Washington, DC 20044
19 Tel: 202-616-8351
20 Fax: 202-616-8470
21 email: nicholas.cartier@usdoj.gov
22 *Attorney for Defendant*

23 **CERTIFICATE OF SERVICE**

24 I hereby certify that on November 26, 2013, I caused a copy of the foregoing to be served
25 on Plaintiff via the Court's ECF system.
26

27 /s/ Nicholas Cartier
28 NICHOLAS CARTIER

GENERAL ORDER NO. 45(X) CERTIFICATION

I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in the filing of this document.

/s/ Nicholas Cartier
NICHOLAS CARTIER

Pursuant to stipulation, the parties shall jointly file a proposed judgment terminating this action no later than December 9, 2013. SO ORDERED.

Dated: 11/26/13


Hon. Richard Seeborg
United States District Judge